



Smucker Quality Beverages, Inc.
Chico, California

April 7, 2006

National Organic Standards Board
c/o Katherine Benham
Room 4008-South Building
1400 and Independence Avenue, SW
Washington, D.C. 20250-0001

Dear National Organic Standards Board,

Smucker Quality Beverage would like to support the continue use of “Flavors, non-synthetic sources only and must not be produced using synthetic solvents and carrier systems or any artificial preservative” as currently listed on section 205.605(a) of the National List. We support the National List Sunset process and the fact that there were no specific comments against the continued use for flavors on the National List during the first request for public comment.

Our company has always been in the forefront of the flavor issue advancing technology so that there will be a time when flavors can be removed from section 205.605 of the National List. Historically, in the early 1990’s we were the first manufacturer to contract with a flavor house to produce certified organic lemon and lime flavors. We purchased certified organic grain alcohol, captured the oils from our organic lemon and organic lime processing and worked with our certification agency to certify the flavor house. Today, we are proud to say that approximately 75% of our products use certified organic flavors. It is our intention, in the very near future; to have all of our organic products reformulated using organic flavors.

In closing, Smucker Quality Beverages does not feel there is currently and adequate supply of organic flavors available to meet the needs of the industry.

Sincerely,

Julia Sabin
General Manager
Smucker Quality Beverages, Inc

Kim Dietz
Regulatory Compliance Manager
Smucker Quality Beverages, Inc.